

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

CLEANUP AND ABATEMENT ORDER NO. 98-08
(Revised April 2, 1998)

**AEROSTRUCTURES GROUP OF BF GOODRICH AEROSPACE
(formerly ROHR, INC.) AND THE BF GOODRICH COMPANY**
850 Lagoon Drive, Chula Vista
San Diego County, California

1. The Aerostructures Group of the Aerospace Division of the BF Goodrich Co. (formerly Rohr, Inc., and hereinafter referred to as Rohr) discharged various wastes from its manufacturing operations at 850 Lagoon Drive in Chula Vista, San Diego County. Rohr has discharged chlorinated solvents, metals, and fuel hydrocarbons to soil and ground water in multiple locations and metals into the storm water conveyance system serving the site. Other wastes associated with metal melting, metal casting, metal parts fabrication, degreasing, cleaning, anodizing, plating, chemical milling, conversion coating, painting, and sludge treatment/recycling activities may have been discharged. Discharges of waste from the storm water conveyance system, whether from within the system or infiltrative, are carried to San Diego Bay by daily tidal flux and storm water. Discharges of waste from Rohr have caused an exceedance of water quality objectives in ground water and surface water.
2. In December 1997, BF Goodrich acquired Rohr and the facility is now known as the Aerostructures Group of the Aerospace Division of BF Goodrich.
3. This enforcement action is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, §21000 et seq.) in accordance with §15321, Chapter 3, Title 14, California Code of Regulations.

IT IS HEREBY ORDERED that BF Goodrich Aerospace (formerly Rohr, Inc.) and The BF Goodrich Company of Richfield, Ohio, hereinafter "the Dischargers," shall cleanup the waste and the effects of the discharges in a manner that conforms with State Water Resources Control Board Resolution No. 92-49¹ and shall:

A. PROVIDE A SITEWIDE ENVIRONMENTAL SITE ASSESSMENT

The Dischargers shall conduct an **Environmental Site Assessment**, commonly known as a Phase One Site Assessment, and submit a report to the San Diego Regional Water Quality Control Board (SDRWQCB) by **June 4, 1998**.

- 1) The **Environmental Site Assessment Report** (hereinafter **Phase One Report**) shall provide comprehensive documentation of historical through present-day facility uses, subsurface infrastructure, and disposal practices. Activities conducted to develop the Phase One Report should be equivalent to the ASTM Standard Practices for Environmental Site Assessments.

The approximate date(s) and specific location(s) of operation(s) relative to permanent references or current surface features should be included. Drawings should be provided in an appropriate and consistent scale and a comprehensive set of aerial and other photographs should be included.

- 2) Site plot plans should clearly illustrate the current and historical alignments and locations of the following features:
 - i. Stormdrains, drainage conveyances (including former earthen/clay lined pipes or flumes), and subsurface utilities and/or backfilled utility trenches.
 - ii. Each building and surface improvement (e.g. roads, fences, tracks).
 - iii. All sumps, oil/water separators, clarifiers, impoundment area(s), and other liquid waste disposal features including the associated discharge points.
 - iv. All waste dumps, burn dumps, treatment/recycling features, and other significant waste storage and solid waste disposal areas.
 - v. All fuel docks, chemical transfer stations, chemical dispensing, chemical baths, degreasers, metal washing, and other waste generating industrial activities.
 - vi. All storage vessels of fuels, oils, and hazardous products or wastes that are or were aboveground, belowgrade, and underground.
 - vii. All areas where rocket fuel, rocket propellant, munitions, or explosives were fired, tested, or otherwise used.
 - viii. Current and former discharge outfalls to San Diego Bay that are/were within 1000 ft bayward of the 1940s shoreline from Gunpowder Point to 1000 feet south of J Street.
 - ix. The inland reach of tidal marine waters within the stormdrains or other subsurface conveyance systems.

All current and former extensions to San Diego Bay or its tributary waters of any of the above features should also be included. Access openings and current and former connections to subsurface drainage systems of all of the above features should also be detailed.

- 3) Lists and explanations of primary materials used, wastes generated, and waste disposal practices should be included and should be integrated with or keyed to the plot plans. Hazardous material storage and dispensing areas should also be described and depicted graphically.
- 4) Areas of known or suspected hydrological connection(s) between surface water and ground water should be described and depicted graphically.

B. CONDUCT COMPREHENSIVE STORM WATER RUNOFF SAMPLING

The Dischargers shall conduct a **Storm Water Runoff Sampling Program** and submit a report to the SDRWQCB by **May 11, 1998**. The comprehensive **Storm Water Sampling Report** shall contain the results of implementing the following required elements:

- 1) For each storm water conveyance collect concurrent samples from the following four locations **during the next storm**:
 - i. the most downgradient, nontidally-influenced, accessible portion of the storm water conveyance system (hereinafter SWCS) for each facility catchment.
 - ii. every drainage outfall along the property line,
 - iii. every drainage outfall located beyond the property line to which Rohr is the sole or primary contributor of runoff (e.g. outfall to F&G Street Marsh), and
 - iv. every sampling location from which previous samples have been collected pursuant to the General Industrial Storm Water Permit not described under i, ii, or iii above.
- 2) At the terminus of all SWCS outfalls to which Rohr is the sole or primary storm water contributor, collect at least one sample of the flow during dry weather. This sampling shall only be performed after one week of dry weather (no rainfall) and only during a low tide when the flow within the storm drain is in the outgoing (seaward) direction.
- 3) Analytical sampling required in 1) and 2) above shall be performed using USEPA-approved methods which have detection levels appropriate for comparison with both fresh and marine water quality objectives. At a minimum, the following constituents should be tested in all samples:
 - i. Priority Pollutant Metals;
 - ii. Volatile Organic Compounds (including PCE, TCE, MTBE and Methylene Chloride)
 - iii. Total Petroleum Hydrocarbons;
 - iv. Polynuclear Aromatic Hydrocarbons;
 - v. Semi-Volatile Organic Compounds;
 - vi. pH;
 - vii. TDS;
 - viii. Specific Conductance
- 4) Adequate quality assurance and quality control (QA/QC) procedures for sampling must be used and photodocumentation of field conditions and sampling locations is required
- 5) Copies of the **analytical laboratory sampling reports** for the sampling described in B.1) and 2) above shall be submitted, along with the laboratory QA/QC materials and the chain-

of-custody documents, to the SDRWQCB **within three working days of the date originally received** by the Dischargers.

C. CONDUCT A COMPREHENSIVE STORM WATER CONVEYANCE SYSTEM INVESTIGATION

The Dischargers shall conduct a comprehensive investigation of the storm water conveyance system (SWCS) that drains all property formerly or currently controlled by the Dischargers. The property to be investigated shall include San Diego Unified Port District tideland areas where the Dischargers have operated. A **Comprehensive Storm Water Conveyance System Investigation Report (SWCS Investigation Report)** shall be submitted to the SDRWQCB by **July 13, 1998**. The following elements are required:

- 1) The alignments, openings, connections, and flow gradients of the SWCS must be identified on map(s), whether or not the conveyances are currently in use. Each outdoor storm drain inlet and indoor floor drain opening shall be detailed, the approximate catchment area for each delineated, and the status of use (e.g. open, covered, permanently sealed, etc.) of the opening described. The competency of the SWCS must be thoroughly evaluated. To locate ends, openings, and interconnection(s), activities such as dye and smoke tests, geophysical techniques or video must be performed. Documentation of all field activity shall be included.
- 2) A description of flows which are or have been transported in each conveyance. At minimum, the description should distinguish flow which originates from precipitation (e.g. rain, snow), commonly called "storm water," from flow which originates from all sources other than precipitation, commonly called "non-storm water." The description shall also include the approximate timeframe each conveyance, or portion of each, was used for a distinct flow type (e.g. pipeline 'AB' held non-storm water-specifically degreasing process wastewater from the north east portion of Building 18 from 1955 to 1962). Elevation drawing showing San Diego Bay tidal influence at both low and high tides within all conveyances originating from the Dischargers' property shall also be included.
- 3) Either concurrently or subsequently to activities 1) and 2) above, a flow quality investigation shall be conducted after a 1 week period of dry weather. For any sediment, sludge, or liquids found within the SWCS at or during low tide, a sample shall be taken, characterized, and analyzed. Field observations of the condition of that portion of the SWCS where the sediment, sludge or liquid was found shall be documented and submitted.
- 4) The Dischargers **may** elect to proceed with sealing, removing, cleaning out, otherwise repairing, or replacing (as appropriate) any portion of the SWCS conveyance to abate or prevent future discharges. Consideration of protecting the quality of both surface water(s)

and of ground water should be incorporated into these decision(s). All such activities undertaken from the date of this order shall be documented **until otherwise notified**.

- 5) **In the future**, a study of the integrity of the SWCS and an evaluation of its utilization and capacity for conveying storm water runoff may be required. Any requirement for such a study may be requested **at a date to be determined**.

D. PERFORM SITEWIDE DATA COMPILATION AND EVALUATION

The Dischargers shall compile and evaluate all geologic, hydrogeologic, geochemical, and soil and ground water quality monitoring data generated within the last 10 years. The Dischargers shall submit a **Data Compilation and Evaluation Report (Data Evaluation Report)** to the SDRWQCB on or before **May 27, 1998**.

- 1) The land area to be addressed shall include all current and former property used, leased, or otherwise controlled by the Dischargers since its inception on the Chula Vista waterfront as Rohr Aircraft Company. The Data Evaluation Report shall also incorporate all available data on properties that are in the upgradient (by ground water direction) of this land area and west of Interstate 5.
- 2) Data taken from original data source documents should be thoroughly referenced (e.g. document names, page numbers, dates, etc.) in the Data Evaluation Report.

E. INTERIM REMEDIAL ACTION(S)

The Dischargers shall conduct an **Interim Remedial Action** as necessary to abate or correct the effects of the discharge and/or to mitigate emergency situations.

- 1) Interim remedial actions may occur concurrently with any other phase of soil and water investigation and/or cleanup and abatement.
- 2) The Dischargers may submit proposals for appropriate interim remedial action(s) for consideration by the SDRWQCB **at any time** during the cleanup and abatement process.

PROVISIONS

No Nuisance:

Neither the treatment nor the discharge of wastes shall create a condition of pollution or nuisance.

Investigative Derived Wastes:

The Dischargers shall properly manage, treat and/or dispose of contaminated soils and ground water in accordance with applicable federal, state, and local regulations. Additional regulatory action may be required to obtain proper permits for remedial actions, waste discharges, and related activities.

Good Operation and Maintenance:

The discharger shall maintain and operate, as efficiently as possible, any facility or control system installed to achieve compliance with the requirements of this Order.

Access to Site and Records:

The Dischargers shall permit the SDRWQCB or its authorized representative:

- i. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
- ii. Access to copy any records required to be kept under the requirements of this Order.
- iii. Inspection of any monitoring or remediation facilities installed in response to this Order.
- iv. Sampling of any ground water or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the Discharger.

Contractor/Consultant Qualifications:

All hydrogeologic documents (plans, specifications, and reports) shall be signed by and stamped with the seal of a California Registered Geologist, a Specialist Geologist, California Certified Engineering Geologist, or a California Registered Civil Engineer with appropriate hydrologic experience.

Lab Qualifications:

All samples shall be analyzed by State-certified laboratories or laboratories accepted by the SDRWQCB using approved US Environmental Protection Agency methods for the type of analysis to be performed.

Periodic Review:

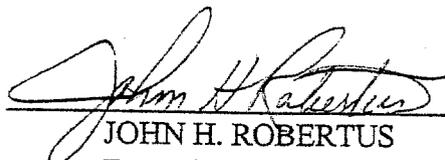
The SDRWQCB will review this Order periodically and may revise it when necessary. The discharger may request revisions and upon review the Executive Officer may recommend that the SDRWQCB revise these requirements.

Notifications/Reporting requirements:

Failure to comply with the requirements of this Order may subject you to enforcement action, including but not limited to: administratively imposed civil liability up to \$5,000 for each day in which the violation occurs, or referral to the Attorney General for injunctive relief or judicially imposed civil liability up to \$15,000 per day, or referral to the District Attorney for criminal prosecution.

Reimbursement of Regulatory Oversight Costs:

The Dischargers are hereby notified that the SDRWQCB is entitled to and plans to seek reimbursement for all reasonable costs actually incurred by the SDRWQCB to investigate unauthorized discharges of waste and to oversee cleanup of such waste, the abatement or effects thereof, or other remedial action required by this cleanup and abatement order. Reimbursable costs may include costs incurred by the SDRWQCB since July 1, 1997. Upon receipt of a billing statement for such costs, the Dischargers shall reimburse the SDRWQCB.



JOHN H. ROBERTUS
Executive Officer

Date issued: April 2, 1998

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REQUIREMENTS AND SCHEDULE:

SUBMITTAL:	DEADLINE:
Phase One Report	June 4, 1998
Lab Report(s) from Storm Water Program	within 3 working days of the date that the Dischargers receive it
Storm Water Sampling Report	May 11, 1998
Data Evaluation Report	May 27, 1998
SWCS Investigation Report	July 13, 1998

Additional submittals will be required. Additional requirements may be established through the adoption of future amendment(s) to this Order or by other administrative means.

ENDNOTES:

¹ State Water Resources Control Board Resolution No. 92-49 as amended is entitled "*Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Waste Code Section 13304.*" The amendment dates are April 1994 and October 1996. This document is attached for your reference.

All State Water Resources Policy and Procedures Documents are available 24 hours per day via the following Internet website: www.swrcb.ca.gov